

ALEX HERNAEZ (State Bar No. 201441)
TYREEN G. TORNER (State Bar No. 249980)
FOX ROTHSCHILD LLP
235 Pine Street, Suite 1500
San Francisco, CA 94104
Telephone: (415) 364-5540
Facsimile: (415) 391-4436
Email: ahernaez@foxrothschild.com
ttorner@foxrothschild.com

Attorneys for Defendant
SAMUEL MERRITT UNIVERSITY

DAVID J. MILLSTEIN (State Bar No. 87878)
MILLSTEIN & ASSOCIATES
100 The Embarcadero, Suite 200
San Francisco, CA 94105
Telephone: (415) 348-0348
Facsimile: (415) 348-0336
Email: dmillstein@millstein-law.com

Attorneys for Plaintiff
JANE DOE

THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE, as an individual,

Plaintiff,

v.

SAMUEL MERRITT UNIVERSITY, a
California Corporation, including
CALIFORNIA SCHOOL OF PODIATRIC
MEDICINE; and Does 1 through 100,

Defendant.

Case No.: 3:13-cv-00007-JSC

**JOINT STIPULATION CONTINUING
DISPOSITIVE MOTION BRIEFING
SCHEDULE**

State Complaint Filed: December 20, 2012
Notice of Removal Filed: January 2, 2013
Trial Date: March 31, 2014

WHEREAS, on August 23, 2013, the Court issued an Amended Pretrial Order setting the following dates in this action:

Deadline for Filing Dispositive Motions:	November 21, 2013
Hearing on Dispositive Motions:	January 9, 2014
Final Pretrial Conference:	March 20, 2014
Trial:	March 31, 2014

WHEREAS, on October 31, 2013, the parties participated in a mandatory settlement conference with Magistrate Judge Elizabeth D. Laporte;

WHEREAS, as a result of October 31, 2013, settlement conference, the parties are close to reaching a settlement in this action;

WHEREAS, in the event the case does not settle, Defendant will file a motion for summary judgment; and

WHEREAS, the parties wish to continue settlement discussions without incurring potentially unnecessary additional costs necessitated by the current dispositive motion briefing schedule;

IT IS HEREBY STIPULATED BY AND BETWEEN the parties, by and through their attorneys of record, that the dispositive motion briefing be continued as follows:

Deadline for Filing Dispositive Motions:	December 3, 2013
Opposition to Dispositive Motion Due:	December 17, 2013
Reply re Dispositive Motion Due:	December 24, 2013
Hearing on Dispositive Motion:	January 9, 2014 or January 23, 2014

DATED: November 1, 2013

Respectfully submitted,

FOX ROTHSCHILD LLP

By: /s/ Tyreen G. Torner

ALEX HERNAEZ
TYREEN G. TORNER

Attorneys for Defendant
Samuel Merritt University

1
2 DATED: November 1, 2013

Respectfully submitted,
MILLSTEIN & ASSOCIATES

3
4 By: /s/ David J. Millstein
5 DAVID J. MILLSTEIN

6 Attorneys for Plaintiff
7 Jane Doe

8
9 The hearing on dispositive motion shall be at 9:00 a.m. on
10 January 9, 2014.

11 Dated: November 4, 2013

